

HDRcv'd by: AN

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

RYAN DILLON-CAPPS

Civil Action

USDC - BALTIMORE
'24 DEC 27 PM 1:03
vs.

*Plaintiff,*No. **BAH 24 CV 3744**OHANA GROWTH PARTNERS, LLC *et al*

Hon. _____

Defendants

COMPLAINT INTEGRATED APPENDIX: EMERGENCY EX PARTE HEARING

Plaintiff incorporates all subsequent sections and attachments herein by
reference as though fully stated in this main document.

TO THE HONORABLE COURT:

1 Pursuant to Federal Rules of Civil Procedure 65(b), 26(c), and 6(c)(1)(C), Plaintiff Ryan
Dillon-Capps respectfully requests an immediate emergency ex parte hearing for the purposes of:

1. Allowing testimony under seal to protect sensitive information and ensure the
safety of all involved parties;
2. Ruling on the following pending motions and requests:
 - 2.1 In Forma Pauperis Relief with Limited Attorney Designation;
 - 2.2 State-Level Negotiations and Systemic Oversight Relief;
 - 2.3 Conditional Permissive Joinder;
 - 2.4 Interlocutory Partial Summary Judgment.

Grounds For Relief

I. TESTIMONY UNDER SEAL

2 Plaintiff seeks an order to secure testimony and evidence under seal due to the sensitive nature of the information involved, including:

1. Explicit admissions by Defendants under oath demonstrating willful violations of federal laws;
2. Evidence revealing systemic judicial misconduct and corruption that, if disclosed publicly, could endanger the Plaintiff and hinder investigations;
3. Records indicating procedural violations and acts of obstruction by state and judicial officials.

II. IMMEDIATE RULINGS ON PENDING REQUESTS

3 The Plaintiff asserts that the urgent nature of the ongoing harm and the systemic issues raised necessitate immediate judicial action on the following motions and requests:

1. **In Forma Pauperis Relief with Limited Attorney Designation:** To provide Plaintiff the ability to effectively present their case while safeguarding access to justice;
2. **State-Level Negotiations and Systemic Oversight Relief:** To address systemic issues involving judicial misconduct and ensure proper oversight;
3. **Conditional Permissive Joinder:** To include additional parties whose participation is necessary for a full resolution of the claims;
4. **Interlocutory Partial Summary Judgment:** To resolve key issues and claims that are fully supported by the evidence and require no further factual determination.

Legal Basis

4 **Rule 65(b):** Temporary restraining orders without notice are warranted when specific facts show that immediate and irreparable harm will result.

5 **Rule 26(c):** Protective orders are appropriate to ensure confidentiality for testimony that risks exposing sensitive legal, financial, or personal matters.

6 **Rule 6(c)(1)(C):** Expedited hearings are warranted in situations where delaying justice risks compounding harm or irreversibly prejudicing the moving party.

Requested Relief

7 Plaintiff respectfully requests that this Court:

1. Schedule an immediate emergency ex parte hearing to consider this motion;
2. Allow testimony under seal to safeguard sensitive information;
3. Rule on the following motions and requests:
 - 3.1 In Forma Pauperis Relief with Limited Attorney Designation;
 - 3.2 State-Level Negotiations and Systemic Oversight Relief;
 - 3.3 Conditional Permissive Joinder;
 - 3.4 Interlocutory Partial Summary Judgment;
4. Provide any additional relief deemed just and proper in the circumstances.

Prayer For Relief

8 For the reasons stated above, Plaintiff prays this Honorable Court will:

1. Grant this Motion for Emergency Ex Parte Hearing;
2. Issue immediate rulings on the specified motions and requests;
3. Provide any further relief this Court deems appropriate.

RESPECTFULLY SUBMITTED

December 25, 2024

/s/ Ryan Dillon-Capps
Ryan Dillon-Capps

Ryan Dillon-Capps

Digitally signed by Ryan
Dillon-Capps
Date: 2024.12.25 13:55:57
-05'00'

1334 Maple Avenue
Essex, Maryland 21221
ryan@mxt3.com
703-303-1113